



WESTON WAY
WEST CHESTER, PA. 19380
PHONE: (215) 692-3030
TELEX: 83-5348

ORIGINAL

(RECEIVED)

JUN 3 1986

30 May 1986

cls 6/4/86
Mr. Robin Aitken
Environmental Engineer
U.S. Environmental Protection Agency
841 Chestnut Building (3HW14)
Philadelphia, PA 19107

RE: NVF Company
Technical Products Division
Kennett Square Plant
PCB Discharge Evaluations
Progress Report No. 1
Chestnut-Co

Dear Mr. Aitken:

Pursuant to your request, I am pleased to submit our first progress report on efforts to construct a siltation dam at the mouth of NVF tributary and other actions which are consistent with the outcome of our meeting on April 15, 1986.

NVF has authorized the hydrological studies needed to size and design the aforementioned siltation dam. Two engineers on my staff, [redacted] and [redacted] have been assigned this task. Within the next week or so, they will visit the site and obtain the necessary rainfall and topographic data needed to conduct the analysis. At the same time I should like to meet with Ms. Cynthia Steele at the site to decide how best to access the construction sites and obtain necessary permission and/or rights-of-way. On several attempts this week and last I have been unsuccessful in trying to contact her.

Following this effort we anticipate starting the process of collecting and evaluating all existing analytical data.

I trust that this information satisfies your requirements at this time. Kindly call if I can be of further assistance.

Very truly yours,

ROY F. WESTON, INC.

[redacted]

Vice President

AJD:ma

AR100085



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Walt to write a
response letter; commen
to him 5/6/86.

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MORRISTOWN

APR 24 1986

21 April 1986

cls
5/2/86

Mr. Robin Aitken
Environmental Engineer
U. S. Environmental Protection Agency
841 Chestnut Building (3HW14)
Philadelphia, PA 19107

Re: NVF Company
Technical Products Division
Kennett Square Plant
PCB Discharge Evaluations

Dear Mr. Aitken:

On behalf of NVF Company (Company), I should like to express my appreciation for your forthrightness and assistance as regards the Kennett Square plant PCB situation at our meeting on April 15, 1986.

As we explained to you and Ms. Steele of PADER, the Company acknowledges its use of Arochlor 1248 (PCB) Compounds as found in the swale and NVF tributary during its operational history prior to 1968. However, the presence of other PCB Compounds in the NVF tributary and swale is the cause of some concern to us as it is well known that the fires, respectively, in the Noznesky junkyard, next door to the plant, and the lumber yard were potentially responsible for their presence. We believe that through the copious use of water on these fires by the fire department, these other PCB Compounds travelled considerable distances in the surrounding water courses because of the flatness of the terrain around the junkyard, especially.

Our attempts to acquire some equitable resolution of this matter with PADER have not been successful. We now see that it has been referred to your agency for further processing.

The Company recognizes that it has a responsibility to fulfill as regards site remediation for PCBs in the local watercourses, particularly. However, they continue to assert their request for proper adjudication of this matter vis-a-vis PCBs in the watercourses from other known sources.

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WESTON

Mr. Robin Aitken
U. S. Environmental Protection Agency

21 April 1986
Page 2

In good faith, moreover, the Company is prepared to move forward with certain actions aimed at defining the battery limits of the proposed clean-up if not the clean-up itself:

- The Company will install a siltation dam at the mouth of the NVF tributary before flow enters the West Branch of Red Clay Creek. This siltation dam will be designed to capture solids during high runoff conditions. A 2 or 5 year storm will be considered for the design of this dam. The time schedule for construction of this dam will be consistent with the acquisition of off-site rights-of-way by Ms. Stseele of PA DER.
- The Company will jointly participate in laying out a definitive sampling plan of the area with PADER and yourselves. The plan will be designed to incorporate all of the PCB analytical data collected on the site to date.
- The Company will prepare a cost quotation for the clean-up as it will have been defined at this stage.

Following the acquisition of these additional data, the Company will weigh all aspects of this situation in the context of other legal and business considerations to arrive at a proper course of action.

I trust that the forgoing action plan is satisfactory for your purpose at this time. I'd like to emphasize that the Company does wish to cooperate to the fullest extent of its own culpability in this matter.

Very truly yours,

ROY E. WESTON, INC.

"non responsive based on revised scope"

Vice President

AJD:ldh

cc: Ms. Steele - PA DER
S. Kovach - NVF
W. Witt - NVF
W. Lair - NVF

"non responsive based on revised scope"

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